

### REMARKS

This Amendment is in response to the Office Action mailed on May 18, 2007, in which claims 1, 4-8 and 20-23 were rejected, and also in response to the telephone interview conducted with the Examiner on May 15, 2007. With this Amendment, claim 18 has been amended and the remaining claims are unchanged. Applicants respectfully request reconsideration and allowance of all pending claims in view of the above amendments and the following remarks.

#### I. INTERVIEW SUMMARY

The interview on May 15, 2007 was regarding a Final Office Action that was mailed on April 6, 2007. After very briefly discussing the rejections in the Final Office Action, the Examiner decided to withdraw the Action. No detailed discussion about the claims and/or the cited reference took place during the interview.

#### II. CLAIM REJECTIONS UNDER 35 U.S.C. §112

On page 2 of the Office Action, claim 18 was rejected under 35 U.S.C. §112, second paragraph. Specifically, the Office Action suggests that it is unclear as to what “it” refers to in line 9 of claim 18. With this amendment, claim 18 has been amended in accordance with the Examiner’s suggestion and therefore the rejection should be withdrawn.

#### III. CLAIM REJECTIONS UNDER 35 U.S.C. §102

On page 3 of the Office Action, the Examiner rejected claims 1, 4-18, and 20-23 under 35 U.S.C. §102(e) based upon Thompson et al., U.S. Patent No. 6,668,253, hereinafter referred to as Thompson.

For a prior art reference to anticipate in terms of 35 U.S.C. §102, every element of the claimed invention must be identically shown in a single reference. *In re bond*, 15 USPQ2d 1566, 1567 (Fed. Cir. 1. 1990) (Emphasis Added.)

The above requirement for anticipation is not met in the rejection of claims 1, 4-18 and 20-23 under 35 U.S.C. §102(e), based upon Thompson.

**A. Independent claim 1**

Independent claim 1 is directed to a computer system that includes components stored on a tangible medium. The components comprise “a uniform interface . . . configured to access the data from the general ledger database by translating the generalized request into a specific query which, upon execution, populates the at least one staging table with the accessed data.” (Emphasis Added.)

In rejecting claim 1, the Office Action first indicates, at the bottom of page 3, that “the transformation and staging server,” which is component 108 in FIG. 1 of Thompson, is equivalent to the “uniform interface” of claim 1. The Office Action then goes on to cite column 31, lines 30-50, column 25, lines 25-40, and column 27, lines 32-40, of Thompson as showing the above-included element of claim 1. However, a substantial portion of this cited language does not even apply to component 108. For example, column 31, lines 30-50, substantially entirely deal with accessing data from the data warehouse, which is component 104 of FIG. 1, that is separate and different from transformation and staging server 108. Further, column 27, lines 32-40, apply to an embodiment of Thompson in which the financial consolidation tool’s database does not reside on the transformation and staging server 108. (See column 27, lines 26-27 of Thompson.) Thus, this language does not even deal with the transformation and staging server 108, which the Office Action suggests is equivalent to the claimed uniform interface. Finally, the description in column 25, lines 25-40, relates to an embodiment of Thompson in which the financial tool’s database resides on the transformation and staging server 108. This is substantially opposite to the earlier-mentioned embodiment (column 27, lines 32-40 of Thompson) in which the financial consolidation tool’s database does not reside on the transformation and staging server 108.

In summary, in the rejection of claim 1, the Office Action combines portions of disparate and incompatible embodiments of Thompson in an attempt to show the elements of claim 1. Further, after suggesting that the transformation and staging server 108 of Thompson is equivalent to the claimed uniform interface, the Office Action, in an attempt to show that

component 108 is equivalent to the claimed uniform interface, selectively cites language in Thompson that is unrelated to component 108 and presents this language as if it were a part of a description of component 108.

In view of the foregoing, Applicants respectfully submit that the cited language of Thompson does not identically show the elements of claim 1. Thus, Thompson does not anticipate claim 1 and therefore claim 1 is allowable.

#### **B. Independent claim 18**

Independent claim 18 is directed to a computer implemented method of retrieving data, from a general ledger database, to satisfy a generalized request from a report object. The method comprises of “receiving the generalized request from the report object; accessing, based upon information included in the generalized request, data from the general ledger database; and utilizing at least one staging table, having a standardized structure which is independent of a structure of the general ledger database, to store at least a portion of the accessed data on a tangible medium before the at least the portion of the accessed data is returned to the report object from the staging table.”

The Office Action suggests that Thompson (column 25, lines 20-30, column 26, lines 40-45, column 31, lines 35-40, column 2, lines 17-20 and column 3, lines 19-22) shows the above elements of claim 18. However, as in the case of the rejection of claim 1, the sections of Thompson cited in connection with claim 18 do not even clearly relate to each other. For example, column 25, lines 20-30, relate to a financial tool having a back-end database into which general ledger information appears to be loaded independently of any generalized request form a report. Column 26, lines 40-45, relate to creating financial reports using methods in which information can be extracted, “possibly from tables.” (See column 26, line 45.) No specifics about these tables are provided. Column 31, lines 35-40, relate substantially entirely to accessing data from a data warehouse and, in contrast, column 2, lines 17-20 and column 3, lines 19-22, relate to a financial consolidation application that is not even connected to the data warehouse. (See FIG. 9 of Thompson.) Such disparate sections of Thompson are not combinable in a manner that produces the invention of claim 18. In summary, nothing in the cited language of Thompson identically

shows the elements of claim 18. Thus, Thompson does not anticipate claim 18 and therefore claim 18 is allowable.

### **C. Independent claim 21**

Independent claim 21 is directed to a computer system that includes components stored on a tangible medium. The components comprise “a uniform interface configured to receive a generalized request form a report object, and based upon information included in the generalized request, access data from at least one staging table that stores information from a single general ledger database on a tangible medium.” (Emphasis Added.)

As with the earlier rejections, the Office Action cites incompatible sections of Thompson in the rejection of independent claim 21. Further, the Office Action includes nothing about retrieval of information from “a single general ledger database.” Applicants respectfully point out that Thompson utilizes a transformation and staging server 108 to consolidate information from multiple general ledger databases or financial systems (for example, FIG. 1 of Thompson shows information from two financial systems 107 and 110 being consolidated by transformation and staging server 108). Since the reporting systems of Thompson get their information from transformation and staging server 108, which is only shown as an element that consolidates information from multiple financial systems, nothing in Thompson identically shows “a uniform interface configured to receive a generalized request form a report object, and based upon information included in the generalized request, access data from at least one staging table that stores information from a single general ledger database on a tangible medium.” (Emphasis Added.) Thus, Thompson does not anticipate claim 21 and therefore claim 21 is allowable.

### **D. Dependent claims**

Applicants respectfully submit that the dependent claims are also allowable at least by virtue of their dependency, either directly or indirectly, from the allowable independent claims. Further, Applicants note that the dependent claims include numerous elements which are not shown or suggested by the Thompson reference. For example, claim 23 includes “the permanent staging table is updated by one of SQL statements and database functions, which are

activated each time the general ledger database is updated." (Emphasis Added.) The Office Action cites column 15, lines 25-30, column 17, lines 23-30 and column 28, line 40 of Thompson as showing this element. In connection with updates to tables, column 15, lines 25-30, only indicate that the database "is updated by queries as needed and procedures specifically when requested." Column 17, lines 23-30, relate to refreshing tables in connection with the execution of queries and improvement of query performance. Column 28, line 40, only mentions inserting from the temporary table into the permanent table. Nothing in the cited language teaches that "the permanent staging table is updated by one of SQL statements and database functions, which are activated each time the general ledger database is updated." In fact, nothing in the cited language even connects the updating of the general ledger database with the updating of the staging table.

In view of the foregoing, Applicants respectfully request reconsideration and allowance of all pending claims 1, 4-18 and 20-23. Favorable action upon all claims is solicited.

The Director is authorized to charge any fee deficiency required by this paper or credit any overpayment to Deposit Account No. 23-1123.

Respectfully submitted,  
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